



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JAM/MEM
F. #2017R00509

*271 Cadman Plaza East
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By Email and ECF

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Re: United States v. Karl Jordan, Jr., et al.
Criminal Docket No. 20-305 (LDH)

Dear Counsel:

Enclosed please find the government's supplemental discovery production for defendants Karl Jordan, Jr. and Ronald Washington in accordance with Rule 16 of the Federal Rules of Criminal Procedure, items Bates numbered 1535 – 1549, which include recorded phone calls from the Metropolitan Detention Center. The government will identify which, if any, of these materials it will seek to admit at trial. Please note items Bates

numbered 1548 – 1549 contains additional disclosures and has been marked “sensitive” pursuant to the Stipulation and Protective Order issued on September 17, 2020. As with all discovery materials provided by the government that contain personal identifying information regarding specific individuals and uncharged third parties, any filings pertaining to discovery materials must comply with Rule 49.1(a) and other applicable law.

Pursuant to Rule 16(b)(1)(C), the Government reiterates its demand for reciprocal notice regarding any expert witness that any of the defendants intends to rely upon. The Government also repeats its request for reciprocal discovery under Fed. R. Crim. P. 16(b). With respect to defendant Washington, the government has not received notice of any alibi and reiterates its demand for disclosure of any alibi defense pursuant to Fed. R. Crim. P. 12.1(a).

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Artie McConnell
Artie McConnell
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cc: Clerk of the Court (LDH) (by ECF) (without enclosures)